KARAGANIS, WHITE & MAGEL LTD.

ATTORNEYS AT LAW

414 NORTH ORLEANS STREET - SUITE 810

CHICAGO, ILLINOIS 60610

JOSEPH V. KARAGANIS
A. BRUCE WHITE
BARBARA ANNE MAGEL
MARK D. ERZEN
JOHN W. KALICH
CHRISTOPHER W. NEWCOMB

TELEPHONE
(312) 836-1177
TELEFAX
(312) 836-9083

June 23, 2006

Writer's Direct Dial: (312) 836-1177 Ext. 150 Writer's E-Mail: BWHITE@K-W.COM

Certified Mail Return Receipt Requested

Thomas J. Krueger Associate Regional Counsel U.S. Environmental Protection Agency 77 West Jackson Boulevard (C-14J) Chicago, Illinois 60604-3590

> Re: Ellsworth Industrial Park Downers Grove, Illinois

Dear Mr. Krueger:

On behalf of the parties that signed the Settlement Agreement and Order in September 2005 (OU1 RI/FS Settlement) we are providing this partial response to your letter of June 12, which requested additional documentation available to the settling parties.

Without limitation or waiver of any potential objections that the settling parties may have individually or in the aggregate, enclosed please find a pair of CDs that include the following responsive materials: reports of sampling conducted at DGSD, Fusibond, Magnetrol and Sterling Park, and copies of expert reports on technical issues submitted by various defendants in the Muniz litigation.

Individual settling parties may provide additional party/property specific information. If you have any questions, feel free to call.

Enclosures

cc: w/o enclosures
Mazin Enwiya, RPM
Soo Attached Sorvice

See Attached Service List

ELLSWORTH SECOND SPECIAL NOTICE LETTER GFO PARTIES' SERVICE LIST

Gary S. Rovner Foley & Lardner 321 N. Clark Street, 23rd Floor Chicago, IL 60610

Pamela R. Hanebutt Linda P. Kurtos Eimer Stahl Klevorn & Solberg LLP 224 S. Michigan Ave., Suite 1100 Chicago, IL 60604

Michael J. Maher Swanson, Martin & Bell One IBM Plaza, Suite 2900 300 North Wabash Chicago, IL 60611

William Dickett Alan Bielawski Sidley Austin Brown & Wood Bank One Plaza 10 S. Dearborn Street Chicago, IL 60603

Joseph A. Strubbe Vedder, Price, Kaufman & Kammholz 222 N. LaSalle Street Chicago, IL 60601

Edward V. Walsh III Sachnoff & Weaver Ltd. 30 S. Wacker Dr., 29th Floor Chicago, IL 60606

Michael S. Blazer Jeep & Blazer, LLC 24 N. Hillside Avenue - Suite A Hillside, IL 60162

Nancy Rich Russell Selman Katten Muchin Zavis 525 W. Monroe - Suite 1600 Chicago, Illinois 60661 Jeremiah P. Connolly Bollinger, Ruberry & Garvey Citicorp Center 500 West Madison St., Suite 2300 Chicago, Illinois 60661-2511

Todd R. Wiener Mark Bilut McDermott, Will & Emery 227 West Monroe Street Chicago, IL 60606-5096

Carol A. Douglas Pat Rooney Ungaretti & Harris 3500 Three Bank One Plaza Chicago, IL 60602

Brett D. Heinrich Meckler, Bulger & Tilson 123 North Wacker Dr., Suite 1800 Chicago, IL 60606

Carey S. Rosemarin 500 Skokie Blvd., Suite 510 Northbrook, IL 60062-2857

Eric L. Samore O'Hagan, Smith & Amundsen, LLC Suite 3300 150 North Michigan Avenue Chicago, IL 60601

Jennifer Waters
Patrick J. Heneghan
Schopf & Weiss LLP
312 West Randolph St., Suite 300
Chicago, Illinois 60606

Gena Gruss Bollinger, Ruberry & Garvey 500 W. Madison - Suite 2300 Chicago, IL 60661

Pbrells2.doc

ELLSWORTH SECOND SPECIAL NOTICE LETTER GFO PARTIES' SERVICE LIST

Gary S. Rovner Foley & Lardner 321 N. Clark Street, 23rd Floor Chicago, IL 60610

Pamela R. Hanebutt Linda P. Kurtos Eimer Stahl Klevorn & Solberg LLP 224 S. Michigan Ave., Suite 1100 Chicago, IL 60604

Michael J. Maher Swanson, Martin & Bell One IBM Plaza, Suite 2900 300 North Wabash Chicago, IL 60611

William Dickett Alan Bielawski Sidley Austin Brown & Wood Bank One Plaza 10 S. Dearborn Street Chicago, IL 60603

Joseph A. Strubbe Vedder, Price, Kaufman & Kammholz 222 N. LaSalle Street Chicago, IL 60601

Edward V. Walsh III Sachnoff & Weaver Ltd. 30 S. Wacker Dr., 29th Floor Chicago, IL 60606

Michael S. Blazer Jeep & Blazer, LLC 24 N. Hillside Avenue - Suite A Hillside, IL 60162

Nancy Rich Russell Selman Katten Muchin Zavis 525 W. Monroe - Suite 1600 Chicago, Illinois 60661 Jeremiah P. Connolly Bollinger, Ruberry & Garvey Citicorp Center 500 West Madison St., Suite 2300 Chicago, Illinois 60661-2511

Todd R. Wiener Mark Bilut McDermott, Will & Emery 227 West Monroe Street Chicago, IL 60606-5096

Carol A. Douglas Pat Rooney Ungaretti & Harris 3500 Three Bank One Plaza Chicago, IL 60602

Brett D. Heinrich Meckler, Bulger & Tilson 123 North Wacker Dr., Suite 1800 Chicago, IL 60606

Carey S. Rosemarin 500 Skokie Blvd., Suite 510 Northbrook, IL 60062-2857

Eric L. Samore O'Hagan, Smith & Amundsen, LLC Suite 3300 150 North Michigan Avenue Chicago, IL 60601

Jennifer Waters
Patrick J. Heneghan
Schopf & Weiss LLP
312 West Randolph St., Suite 300
Chicago, Illinois 60606

Gena Gruss Bollinger, Ruberry & Garvey 500 W. Madison - Suite 2300 Chicago, IL 60661

Pbrells2.doc

U.S. Postal Service CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided) 5340 CHICAGO IL 60604 1.5199 Postage 4000 . 42.00 Certified Fee 02 / Return Reciept Fee (Endorsement Required) . 8185 2030 Restricted Delivery Fee (Endorsement Required) \$0.00 Total Postage & Fees 06/23/2006 7002 Street, Apt. No.; or PO Box No. City, State, ZIP+4 See Reverse for Instructions

Main Identity

From:

"Bruce White" <bwhite@k-w.com>

To:

<Krueger.Thomas@epamail.epa.gov>

Cc:

"Todd Weiner" <twiener@mwe.com>; "Steve Handler" <SHandler@MWE.com>; "Selman, Russell B." <russell.selman@kmzr.com>; <rlehner@sachnoff.com>; "Rick Mueller" <muellerf@jbltd.com>;

<mmaher@smbtrials.com>; "Mark Bilut" <mbilut@mwe.com>; "Laura O Conneil"
<laura.oconnell@kattenlaw.com>; "Kurtos, Linda" <lkurtos@EimerStahl.com>; "Kalich, John"
<jkalich@k-w.com>; "Joe Strubbe" <jstrubbe@vedderprice.com>; "Jerry Connolly"
<Jerry.Connolly@BRG-law.net>; "Jennifer A. Waters" <Waters@sw.com>; "Harris, Susan V."
<svharris@Sidley.com>; <growner@foleylaw.com>; "Gena Romagnoli" <gena.romagnoli@brg-law.net>; "Garrett L. Boehm" <bohreng@jbltd.com>; <ewalsh@sachnoff.com>; "Erzen, Mark"
<marxen@k-w.com>; "Elizabeth Hangay" <ebanyay@smbtrials.com>; "Early Scott F."

"Carey Rosemarin (csr@RosemarinLaw.com)" <csr@rosemarinlaw.com>; "BRUCE NELSON"

<br/

<ESamore@osalaw.com>; <Enwiya.Mazin@epamail.epa.gov>

Sent:

Friday, June 23, 2006 12:14 PM

Subject:

Re: Ellsworth - time critical correspondence - initial response

Tom:

On behalf of the parties that signed the Settlement Agreement and Order in September 2005 (OU1 RI/FS Settlement), this afternoon we are mailing out a partial response to your letter of June 12, 2006, which requested various additional categories of documentation if it was available to the settling parties.

Without limitation or waiver of any potential objections that the settling parties may have individually or in the aggregate, we are providing a pair of CDs that include the following materials: reports of sampling conducted at DGSD, Fusibond, Magnetrol and Sterling Park, and copies of expert reports on technical issues submitted by various defendants in the Muniz litigation.

Individual settling parties may provide additional party/property specific information. However, because of time pressures they are all facing in Ellsworth related litigation matters, we anticipate it will be several weeks before any such individual responses are provided. Any objections on their behalf are expressly reserved.

If you have any questions, feel free to call

Bruce

Bruce White Karaganis, White & Magel, Itd. 414 North Orleans Suite 810 Chicago, IL 60610

312-836-1177 Ext. 150 (phone) 312-836-9083 (fax) BWhite@K-W.com ---- Original Message -----From: <Krueger.Thomas@epamail.epa.gov> To: "Bruce White" <bwhite@k-w.com>

Cc: <Enwiya.Mazin@epamail.epa.gov> Sent: Monday, June 12, 2006 9:02 AM Subject: Ellsworth - time critical correspondence

> (See attached file: ellsworth.612.pdf)

KARAGANIS, WHITE & MAGEL LTD.

ATTORNEYS AT LAW

414 NORTH ORLEANS STREET - SUITE 810

CHICAGO, ILLINOIS 60610

TELEPHONE (312) 836-1177

TELEFAX

(3)2) 836-9083 July 11, 2006 WRITER'S DIRECT DIAL: (312) 836-1177 EXT. 150 WRITER'S E-MAIL: BWHITE@K-W.COM

Certified Mail Return Receipt Requested

JOSEPH V. KARAGANIS

BARBARA ANNE MAGEL

CHRISTOPHER W. NEWCOMB

A. BRUCE WHITE

MARK D. ERZEN

JOHN W. KALICH

Thomas J. Krueger Associate Regional Counsel U.S. Environmental Protection Agency 77 West Jackson Boulevard (C-14J) Chicago, Illinois 60604-3590

> Re: Ellsworth Industrial Park Downers Grove, Illinois

Dear Mr. Krueger:

On behalf of the Precision Brand Products, we are providing this individual response to your letter of June 12, 2006 which requested additional documentation available to the settling parties. This submittal is supplemental to the general response previously provided on behalf of all settling parties, and incorporates by reference all of the responses submitted and yet to be submitted by individual parties (including without limitation the documents accompanying the prior submittal by Rexnord).

Without limitation or waiver of any potential objections that the other settling parties may have individually or in the aggregate, enclosed please find a CD that includes the depositions of ex-employees of Precision or DuPage Manufacturing taken in the Muniz class action, and interrogatory responses provided by Precision to various parties in that action. An index is also enclosed.

If you have any questions, feel free to call.

Enclosures cc: w/o enclosures Mazin Enwiya, RPM

	2-4-	Casa	Description						
No.	Date	Case	Description Provision Broad Braduats, Inc. 's Objections to "Digintiffe" Interrogatories to						
			Precision Brand Products, Inc.'s Objections to "Plaintiffs' Interrogatories to Defendant Precision Brand Products, Inc." and "Plaintiffs' First Request For						
	06/20/04	Muniz	· · · · · · · · · · · · · · · · · · ·						
1	06/30/04	Wuniz							
1	1		Defendant Precision Brand Products, Inc.'s Responses to Plaintiffs'						
	00/04/05	N A	Interrogatories and to Plaintiffs' First Request For Production to Defendant						
2	03/24/05	Muniz	ecision Brand Products, Inc.						
3	10/24/05		Warren Shrader's Deposition (DuPage Manufacturing)						
4	11/03/05	Muniz	Chester Bailey's Deposition (DuPage Manufacturing)						
5	11/03/05	Muniz	Gordon Hoppestad's Deposition (Precision Brand Products)						
5	11/04/05	Muniz	Wesley Anderson's Deposition (DuPage Manufacturing)						
6	11/17/05	Muniz	Mary Rita Torrez's Deposition (DuPage Manufacturing)						
7	01/18/06	Muniz	Maurice Heiberger's Deposition (DuPage Manufacturing)						
	ļ		Defendant/Third-Party Plaintiff Precision Brand Products, Inc.'s Objections to						
			Interrogatory of Defendant/Third-Party Plaintiff RHI Holdings, Inc. and The						
8	04/17/06	Muniz	Fairchild Corporation						
	1		Defendant/Third-Party Plaintiff Precision Brand Products, Inc.'s Objections to First						
9	04/17/06	Muniz	Set of Interrogatories of Defendant/Third-Party Plaintiff Lovejoy, Inc.						
			Defendant/Third-Party Plaintiff Precision Brand Products, Inc.'s Objections to and						
	04/17/06	Muniz	Responses to Discovery Requests of Defendant/Third-Party Plaintiff Arrow Gear						
10	Company								
	1		Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision						
			Steel Warehouse, Inc.'s Answer to Bison Gear & Engineering Corporation's First						
11	06/28/06	Pote	Set of Interrogatories to Third-Party Plaintiffs						
			Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision						
		!	Steel Warehouse, Inc.'s Answer to Defendant Scot, Incorporated's First Set of						
12	06/28/06	Pote	Interrogatories to Defendants and Third-Party Defendants						
			Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision						
			Steel Warehouse, Inc.'s Answer to RHI Holdings, Inc.'s First Set of Interrogatories						
13	06/28/06	Pote	to Third-Party Plaintiffs						
			Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision						
			Steel Warehouse, Inc.'s Response to Third Party Defendant Downers Grove						
	1	Bendik/	Sanitary District's First Set of Interrogatories and Requests for Production of						
14	06/28/06	Pote	Documents to All Third-Party Plaintiffs						
			Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision						
			Steel Warehouse, Inc.'s Answer to The Morey Corporation's First Set of						
15	06/28/06	Pote	Interrogatories to Third-Party Plaintiffs and Third-Party Defendants						
			Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision						
			Steel Warehouse, Inc.'s Answer to Defendant Lindy Manufacturing Company's						
			First Set of Interrogatories to Defendants, Third-Party and Fourth-Party						
16	06/28/06	Pote	Defendants						
			Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision						
			Steel Warehouse, Inc.'s Answer to Third-Party Defendant Lindy Manufacturing						
17	06/28/06	Bendik	Company's First Set of Interrogatories to Third-Party Plaintiffs						
			Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision						
	ł		Steel Warehouse, Inc.'s Answer to Third-Party Defendant Magnetrol International,						
18	06/28/06	Pote	Inc.'s First Set of Interrogatories to Third-Party Plaintiffs						

	D-4-	0					
No.	Date	Case	Description Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision				
	00100100	D-4-	Steel Warehouse, Inc.'s Answer to Lovejoy's Interrogatories to Defendants and				
19	06/28/06	Pote	Third-Party Defendants				
			Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision				
			Steel Warehouse, Inc.'s Answer to Third-Party Defendant Chase-Belmont				
			Properties' Interrogatories and Requests for Production of Documents to Third-				
20	06/28/06	Pote	Party Plaintiffs				
			Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision				
			Steel Warehouse, Inc.'s Response to Third-Party Defendant Arrow Gear				
1 1			Company's First Set of Interrogatories and Document Production Requests to				
21	06/28/06	Bendik	Third-Party Plaintiffs				
			Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision				
			Steel Warehouse, Inc.'s Answer to William Helwig and Downers Grove Bank as				
			Trustee Under Trust 85-77's Interrogatories to Third-Party Plaintiffs and Third-				
22	06/28/06	Pote	Party Defendants				
			Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision				
			Steel Warehouse, Inc.'s Answer to Third-Party Defendant Tricon Industries, Inc.'s				
23	06/28/06	Bendik	First Set of Interrogatories to Third-Party Plaintiffs				

1551	U.S. Postal Service MalL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)					
397	For delivery information visit our website at www.usps.com					
Ŋ	Postage \$ 1.35 CKACHICAGO					
4000	Certified Fee 2.90 Postmark					
<u></u>	Return Reciept Fee (Endorsement Required)					
J3 0	Restricted Delivery Fee (Endorsement Required)					
밉	Total Postage & Fees \$ 5.60					
7002	Sirvet Apt. No.; or PO Box No. USG PA - NA W. Suthern Blog. City, State, ZIP+4 (Market Self 160604)					
	City, State, ZIP+4 (MACAY IL 160604					
	PS Form 3800, June 2002 See Reverse for Instructions					



Weston Solutions, Inc.
Suite 1210
20 N. Wacker Drive
Chicago, IL 60606-2901
312-424-3300 • Fax 312-424-3330
www.westonsolutions.com

24 August 2007

Mr. Mazin Enwiya Work Assignment Manager U.S. Environmental Protection Agency 77 West Jackson Boulevard Chicago, Illinois 60604

U.S. EPA Contract No.: 68-W7-0026 Work Assignment No.: 251-RICO-B52A Document Control No.: RFW251-2F-AYEL

Subject:

Remedial Investigation Data Deliverable Document

Ellsworth Industrial Park Downers Grove, Illinois

Dear Mr. Enwiya:

Weston Solutions, Inc. (WESTON) is pleased to submit for the United States Environmental Protection Agency (U.S. EPA) review, two copies of the Remedial Investigation Data Deliverable Document for the Ellsworth Industrial Park Site (EIP Site) in Downers Grove, Illinois. This document contains all data generated during the 2006-2007 Remedial Investigation (RI) and was created as an initial component for the upcoming RI Report. The purpose of this document is to distribute all of the data generated during the 2006-2007 investigation in the interest of information sharing. It is expected that all stakeholders will review this data and provide comments or request clarification in order to resolve any discrepancies prior to the submittal of the RI Report.

Site History

The EIP Site is located in Downers Grove, DuPage County, Illinois (**Figure 1**). Built in the late 1950s, the site currently consists of approximately 135 businesses. The approximate boundaries of the overall site are Burlington Avenue to the north, 63^{rd} Street to the south, Lee and Springside Avenues to the east, and Interstate 355 to the west. The overall EIP Site has been further subdivided by the U.S. EPA into Operable Unit 1 (OU1) and Operable Unit 2 (OU2). The 2006-2007 RI was conducted within OU1, which consists primarily of commercial and/or light industrial properties contained within the Industrial Park (**Figure 2**). OU2 consists primarily of residential, recreational, and commercial properties and is located south and west of OU1, outside of the Industrial Park.

A number of past investigations have been conducted related to the EIP Site (both within and surrounding the Industrial Park) by Federal, State, Municipal, and private property owners. Listed below is a brief overview of these activities:

I:\WO\RAC\251\37402LTR.doc

RFW251-2F-AYEL



2

24 August 2007

- Between Spring and Fall 2001, the Illinois Environmental Protection Agency (IEPA) conducted residential well sampling east of I-355 in response to citizen concerns related to private-well sampling in neighboring Lisle.
- In response to the 2001 sampling activities, IEPA conducted a groundwater investigation within the EIP Site during the Spring 2002.
- In February 2002, the U.S. EPA and the IEPA conducted a joint-effort Phase I Site Assessment (SA) within and outside the EIP Site to further evaluate the presence of chlorinated solvent groundwater contamination and narrow down potential source areas.
- Based on the results of the previous investigations, a Phase II SA was undertaken as a joint effort between the U.S. EPA and the IEPA.
- A Supplemental Investigation, performed in the Spring 2004, was undertaken by the U.S. EPA to further investigate 27 additional properties within and outside of the EIP Site boundaries.
- The U.S. EPA conducted additional hydrogeologic characterization of the EIP Site in 2003 and 2004.
- A number of investigations conducted by private parties (including, but not limited to):
 - 5225 Walnut Street United Environmental Consultants Inc., 1994
 - 2537 Curtiss Street Environmental Group Services Ltd., 2000
 - 2525 Curtiss Street Caddis Inc., 2000
 - 2659 Wisconsin Avenue Pioneer Environmental Inc., 2000 and 2001
 - Wastewater Treatment Plant Sewage Lagoon Area Downers Grove Sanitary District, 2002
 - 5000-5111 Chase Avenue EarthTech, 2003

Summary of the 2006-2007 Remedial Investigation

Following the guidance of the Quality Assurance Project Plan (QAPP, WESTON 2006), WESTON conducted the RI between 3 October 2006 and 23 February 2007. The RI consisted of the following activities:

- Site Reconnaissance
 - Building Inspection
 - Sub-slab Passive Gas Sampling
 - Utility Corridor Sampling



3

24 August 2007

- Geological Investigation Soil
 - Inside Buildings
 - Outside Buildings
- Hydrogeological Investigation Groundwater
 - Grab Groundwater Sampling
 - Monitoring Well Installation
 - Monitoring Well Development
 - Monitoring Well Sampling
 - Hydraulic Conductivity Testing
 - Groundwater Elevation Measurements
 - Monitoring Well Surveying

Figures 3A and 3B present the locations of all existing and newly installed sample locations for the EIP Site. Tables 1 and 2 present a summary of the investigations conducted during the RI.

The building inspections were conducted at 33 different properties from 3 October 2006 through 30 October 2006. The building inspections consisted of a visual inspection of the respective building interiors and determination of locations for sub-slab passive gas sampling.

The sub-slab passive gas sampling was conducted within 33 different buildings from 11 October through 9 November 2006. The sub-slab passive gas sampling consisted of ground-penetrating radar (GPR) scans for buried utilities and concrete coring prior to sampler installation. A total of 100 (90 investigative and 10 duplicate) passive gas samples were collected and submitted for volatile organic compound (VOC) analysis. **Figures 4A** through **4L** present the locations and **Tables 3A** through **3L** present the analytical results of the sub-slab passive gas samplers.

The utility corridor sampling was conducted within sanitary sewer manholes and storm sewer catch basins from 1 November through 8 December 2006. A total of 69 (62 investigate and 7 duplicate) utility corridor samples were collected and submitted for VOC analysis. **Figure 5** presents the locations and **Table 4** presents the analytical results of the utility corridor samplers.

The soil investigation consisted of advancing 22 soil borings within 10 different buildings from 2 through 10 January 2007. GPR and concrete coring was conducted prior to the soil boring advancement. A total of 114 (102 investigative and 12 duplicate) soil samples from the soil borings within buildings were collected and submitted to U.S. EPA Region V Environmental Service Assistance Team (ESAT) Mobile Laboratory for VOC analysis. A total of 18 (16 investigative and 2



4

24 August 2007

duplicate) confirmation soil samples from the soil borings within the buildings were submitted to U.S. EPA Region V Central Regional Laboratory (CRL) for VOC analysis. The soil investigation also consisted of advancing 151 soil borings at 22 different properties from 7 November through 20 December 2006. A total of 1,041 (942 investigative and 99 duplicate) soil samples from the soil borings outside of buildings were collected and submitted to ESAT for VOC analysis. A total of 276 (251 investigative and 25 duplicate) confirmation soil samples from the soil borings outside of buildings were collected and submitted to CRL for VOC analysis. Soil samples were also collected as part of the hydrogeologic investigation and are discussed in the next paragraph. **Figures 6A** through **6L** present the soil boring locations and **Tables 5A** through **5M** present the soil analytical results of both the geologic and hydrogeologic investigation.

The hydrogeologic investigation consisted of advancing 75 soil borings at 18 different properties from 2 January through 2 February 2007. A total of 754 (686 investigative and 68 duplicate) soil samples were collected and submitted to ESAT, CRL, and U.S. EPA Contract Laboratory Program (CLP) laboratories for VOC analysis. A total of 70 (66 investigative and 4 duplicate) confirmation soil samples were collected and submitted to CRL for VOC analysis. A total of 33 (30 investigative and 3 duplicate) soil samples were collected and submitted for grain size, total organic carbon (TOC), cation exchange capacity (CEC), and oxidation reduction potential (ORP) analysis. A total of 13 soil samples (all investigative) were collected and submitted for hydraulic permeability analysis. Of the 75 soil borings; 30 intermediate, 26 shallow (10 of intermediate and shallow nested pairs), and nine bedrock monitoring wells were installed and developed (wells were not installed at 20 of these soil borings).

A total of 163 groundwater samples (grab and monitoring well) were collected from the Ellsworth Industrial Park Site during the 2006-2007 RI. Grab groundwater sampling activities were conducted from 15 November through 21 December 2006. A total of 30 (27 investigative and 3 duplicate) grab groundwater samples were collected from 29 temporary monitoring wells installed during the soil boring advancement activities. The monitoring well groundwater sampling activities were conducted from 8 through 22 February 2007. A total of 133 (119 investigative and 14 duplicate) groundwater samples were collected from newly installed and existing monitoring wells. A total of 35 (32 investigative and 3 duplicate) groundwater samples were collected and submitted for anions, alkalinity, dissolved gases, nitrate-nitrite, sulfate, and TOC. Figures 7A through 7L present the locations of all groundwater sample locations and Tables 6A through 6M present the analytical results of the hydrogeologic investigation.

Rising and falling head slug tests were conducted at 38 different monitoring well locations from 31 January through 23 February 2007. **Table 7** presents the data from the slug tests.

 $I:\WO\RAC\251\37402LTR.doc$

RFW251-2F-AYEL



5

24 August 2007

Laboratory analyses for the RI were performed by numerous laboratories, including:

- U.S. EPA Region V ESAT Mobile Laboratory
- U.S. EPA Region V CRL located in Chicago, Illinois
- U.S. EPA CLP
 - o Mitkem Corporation (Mitkem) located in Warwick, Rhode Island
 - o Shealy Environmental (Shealy) located in Cayce, South Carolina
 - o Datachem Laboratory, Inc (Datachem) located in Salt Lake City, Utah
 - o Liberty Analytical Corporation (Liberty) located in Cary, North Carolina
 - o A4 Scientific (A4) located in The Woodlands, Texas
- U.S. EPA Environmental Response Team (ERT)/Response Engineering and Analytical Contract (REAC) Laboratory located in Edison, New Jersey
- CGC Inc (CGC) located in Madison, Wisconsin
- ESN Rocky Mountain (ESN) located in Golden, Colorado
- Beacon Environmental Services, Inc (Beacon) located in Bel Air, Maryland.

The following table lists all of the laboratories and the analyses performed by each.

Sample Matrix	Analysis	U.S. EPA Region V ESAT	U.S. EPA Region V CRL	U.S. EPA CLP	U.S. EPA ERT/ REAC	CGC	ESN	Beacon
Air	VOCs				х			X
Soil	VOCs	х	х	X				
	TOC		х					
	CEC						х	
	ORP						х	
	Grain Size		х					
	Hydraulic Conductivity					x		
Groundwater	VOCs		х					
	Alkalinity		х					
	Major Anions		х		:			
	Nitrate-Nitrite		х					
	TOC		х					
	Sulfate						х	
	Dissolved Gases						х	



6

24 August 2007

The following table lists the analytical methods used for each sample matrix.

Sample Matrix	Analysis	Laboratory	Analytical Method	Units	
Air	Utility Corridor VOCs	U.S. EPA ERT/ REAC	VOCs	μg/m³	
	Passive Gas VOCs	Beacon	SW8260	ng	
Soil	VOCs	U.S. EPA Region V ESAT	VOCs		
		U.S. EPA Region V CRL	GCMS001, GCMS023, EPA624, EPA8260	μg/kg	
		U.S. EPA CLP	CVOL		
	TOC	U.S. EPA Region V CRL	ASA-SSSA	%	
	CEC –		CEC	meq/100g	
	Aluminum Calcium Magnesium Potassium	ESN	SW6010B	mg/kg	
	ORP	ESN	HACH8193	mv	
	Grain Size	U.S. EPA Region V CRL	ASTM	%	
	Hydraulic Conductivity	CGC	HYD PERM	cm/sec	
Groundwater	VOCs	U.S. EPA Region V CRL	GCMS001, GCMS009, EPA 624	μg/L	
	Major Anions – Chloride Fluoride Nitrate-Nitrite N	U.S. EPA Region V CRL	EPA325.3 EPA340.2 EPA353.2	mg/L	
	Alkalinity	U.S. EPA Region V CRL	EPA 310.1	mg/L	
	TOC	U.S. EPA Region V CRL	EPA 415.1 .	mg/L	
	Sulfate	ESN	9056MOD	mg/L	
	Dissolved Hydrogen Gas – Ethane Ethene Methane	ESN	NLAG108	mg/L	

μg/m³ = micrograms per cubic meter

ng = nanograms

μg/kg = micrograms per kilogram

% = percent

meq/100g = milliequivalents of aluminum, calcium, magnesium, and potassium per 100 grams of soil

mg/kg = milligrams per kilogram

mv = millivolts

cm/sec = centimeters per second

μg/L = micrograms per liter

mg/L = milligrams per liter



24 August 2007

Overall Database:

WESTON has included on CD-ROM a copy of the EIP Site database, all EDDs, slug test graphs, and electronic boring logs from the 2006-2007 RI.

7

WESTON used EQuIS®, developed by Earthsoft Computer Systems, as the environmental data management system to compile the EIP Site database. Information collected in the field and EDDs received from the laboratory were electronically uploaded to EQuIS for data reduction and interpretation purposes. The database includes information collected during previous investigations and the RI.

Upcoming Deliverables

Future data deliverables will consist of the following:

- Human Health Risk Assessment (HHRA)
- Screening-Level Ecological Risk Assessment (SLERA)
- RI Report

In accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), a baseline HHRA will be prepared to evaluate the potential human health impacts associated with the EIP Site under a no-action alternative (*i.e.*, in the absence of remedial [corrective] action). The risk assessment will evaluate the potential for adverse impacts associated with exposure to chemicals in soil and groundwater.

A screening-level ecological risk assessment (SLERA) will be conducted to evaluate the potential effects of chemical contaminant of potential ecological concern (COPEC) on ecological receptors inhabiting the EIP Site and adjacent areas. The SLERA will be performed in accordance with the current Superfund ecological risk assessment guidance (Ecological Risk Assessment Guidance for Superfund [ERAGS], Process for Designing and Conducting Ecological Risk Assessments [EPA/540-R-97-006] and the Role of Screening-Level Risk Assessments and Refining Contaminants of Concern in Baseline Ecological Risk Assessments, ECO Update, [EPA 540/F-01/014]).

The RI Report will present the results from the field investigation conducted at the EIP Site and will be prepared in accordance with the U.S. EPA Guidance for Conducting Remedial Investigations and Feasibility Studies under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Interim Final (Guidance Document) (U.S. EPA, 1988).



8

24 August 2007

If you have any questions or require clarification, please feel free to contact us.

Very truly yours,

WESTON SOLUTIONS, INC.

Joseph M. Ruiz Site Manager

Enclosure

RFW251-2F-AYEL

Table of Contents

Attachment A: Tables

Attachment B: Figures

Attachment C: CD-ROM